

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

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Robert Ward, *on his own behalf and on behalf  
of all others similarly situated,*

Plaintiff,

v.

Flagship Credit Acceptance LLC,

Defendant

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Civil Action No.: 2:17-cv-02069-MMB

**MOTION FOR (1) AN AWARD OF ATTORNEYS' FEES AND EXPENSES AND  
(2) AN INCENTIVE AWARD TO THE NAMED PLAINTIFF**

Pursuant to Fed. R. Civ. P. 23(h), the Parties' Settlement Agreement and in accordance with Paragraphs 11 & 21 of the Court's Preliminary Approval Order (Doc. No. 21), Plaintiff Robert Ward and Class Counsel respectfully move

this Court for an Order awarding attorneys' fees and expenses of \$1,333,333.33 (one-third of the \$4 million Settlement Fund) and for an incentive award to the Class Representative in the amount of \$10,000.00.

In support, Plaintiff and Class Counsel submit the accompanying memorandum of law in support and the Declarations of Class Counsel Sergei Lemberg and Stephen F. Taylor.

For the reasons set forth in the accompanying memorandum, Plaintiff and Class Counsel respectfully request that the Court grant this motion and award the requested fees, expenses and incentive award.

Dated: March 19, 2019

Respectfully submitted,

Robert Ward, *individually and on behalf of all  
others similarly situated,*

By: /s/ Stephen Taylor

Sergei Lemberg  
Stephen Taylor  
Lemberg Law LLC  
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**CERTIFICATE OF SERVICE**

I, Stephen Taylor, an attorney, certify that, on March 19, 2019, the foregoing was filed with the Clerk of the Court through the CM/ECF system which sent notice of such filing to the following:

Gerald E. Arth  
Steven J. Daroci, II  
Fox Rothschild LLP  
2000 Market Street, 20th Floor  
Philadelphia, PA 19103

/s/ Stephen Taylor  
Stephen Taylor